

PSJ2 Exh 156

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DECLARATION OF RAMONA HARRISON

I, Ramona Harrison, declare as follows:

1. My name is Ramona Harrison. I am over the age of 18 and competent to make this Declaration. The information contained herein is based on the personal knowledge I gained when I was employed by Dr. Adolph Harper.
2. I worked as a receptionist at the office of Dr. Adolph Harper from 2010 through January of 2012. My responsibilities included answering the phones, scheduling patient appointments, and calling in prescriptions to pharmacies. When I started working at Dr. Harper's office, I also scheduled his surgeries. At some point during my tenure, Dr. Harper lost his privileges at all local hospitals and was unable to perform surgeries, which negatively impacted his income.
3. When I began working for Dr. Harper in 2010, he treated both pain management patients (male and female) and gynecology patients. While I was there, the pain management business grew steadily, and the amount of pain patients he saw increased significantly. By the time I stopped working for Dr. Harper in early 2012, he was seeing about 30 patients a day, Monday through Thursday. The majority of these patients were pain management patients, and most lived in the Akron area.
4. When I began working for Dr. Harper, his office was located at 2569 Romig Road in Akron, Ohio inside a residential apartment complex called The Woods. Around the summer of 2011, Dr. Harper moved his office down the street to 2172 Romig Road, after he was evicted from The Woods complex. Dr. Harper was evicted from The Woods complex because many of his pain management patients appeared to be drug addicts, and they were disturbing the residents who lived at the complex.
5. Dr. Harper frequently prescribed Opana, OxyContin, oxycodone, Percocet and Vicodin to his patients. Because Ohio Medicaid and many insurance companies often did not cover branded opioids like Opana and OxyContin, many of the painkillers Dr. Harper prescribed

were generic. However, many patients would pay cash for branded drugs like Opana and OxyContin.

6. Dr. Harper was usually very late for his appointments, and he rarely showed up for work on time. Patients often waited up to two or three hours before seeing him. On many occasions, Dr. Harper was still seeing patients when I left work for the day.

7. Most of Dr. Harper's patients appeared to be drug addicts. They often looked disheveled and their behavior indicated that they were high on drugs. Dr. Harper's waiting room was usually full, with some people needing to stand because there were not enough seats. Many patients nodded off while they were waiting to see the doctor. Others were belligerent towards me and the other staff members, or argued with other patients in the waiting room. Some patients who appeared to be high on drugs urinated on themselves while in the waiting room, and some patients periodically vomited in the water fountain in the office.

8. Dr. Harper employed a drug screening technician named Ramia, who worked in the office screening patient urine samples for drugs. Through my conversations with Ramia, I learned that many of Dr. Harper's patients tested positive for street drugs before their appointments with Dr. Harper. The doctor was aware of the test results, but did not seem to care. He continued to prescribe painkillers to his patients regardless of their drug screening results.

9. In the summer of 2011, shortly after the office had moved to 2172 Romig Road, a female patient started a physical altercation with Dr. Harper's medical assistant, Tequilla Berry, in an examination room. I do not know what precipitated the altercation, but it occurred in front of Dr. Harper. The entire office, including other patients and the staff, overheard the altercation. The patient's brother was in the waiting room at the time and subsequently burst into the examination room, yelling to Ms. Berry that he was going to get a gun from the trunk of his car. Dr. Harper's

daughter and office assistant, Adria Harper, called 911. Within a few minutes, numerous police officers arrived at the office.

10. Police officers raided Dr. Harper's office on at least two occasions. I was present during a raid that occurred in 2011 when the practice was still located at The Woods complex. Police officers separated and interviewed all of the employees and seized some records. The office was raided again several months later in 2011 at the new office location. I was not present, though, because it occurred early in the morning, before my work hours. Someone from the office called me before I arrived at work and told me not to come in that day. Dr. Harper definitely seemed rattled after these police raids, but he continued to see pain management patients with the same frequency and did not alter his prescribing habits.

11. When I first started working for Dr. Harper's office in 2010, all of the area pharmacies filled the doctor's prescriptions. As Dr. Harper's pain management business grew, many area pharmacies began to push back on his opioid prescriptions by calling the office to verify that they were legitimate and suggesting that he was prescribing too many opioids to his patients. Gradually, most of the retail chain pharmacies in the area stopped filling prescriptions for opioids written by Dr. Harper. The independent pharmacies eventually stopped filling prescriptions written by Dr. Harper as well. My understanding is that many of Dr. Harper's patients ended up filling their prescriptions in distant locations such as Columbus, Ohio and Erie, Pennsylvania.

12. Dr. Harper pre-signed prescriptions for opioids. I and other members of the staff passed out pre-signed prescriptions to patients when Dr. Harper was out of the office. This only occurred when Dr. Harper was on vacation. When he had a planned extended absence from the office, Dr. Harper pinned the pre-signed prescriptions to the charts of patients who had standing appointments. When the patients came in, I and other staff members handed the patients their prescriptions and told them that they would have to wait until the doctor returned to the office if

they had any questions. I initially questioned Dr. Harper to make sure it was proper to distribute painkiller prescriptions to patients who were not being examined. Dr. Harper assured me that it was fine.

13. Dr. Harper frequently prescribed Opana, and his prescribing of Opana increased as his pain management practice expanded. Dr. Harper started prescribing Opana when the Opana sales representative introduced it to him.

14. The Opana sales representative, a large man named Anthony who used to play football, was a regular presence at Dr. Harper's practice. Anthony came to the office and met with Dr. Harper approximately once a week. As soon as Anthony entered the office, I or another staff member would let Dr. Harper know that he was there. Dr. Harper met privately with Anthony in his office. Their meetings usually lasted about twenty or thirty minutes. Anthony regularly provided Dr. Harper with coupons to give to patients to help them pay for Opana. Anthony's frequent visits to Dr. Harper coincided with an increase in the amount of Opana prescriptions that he wrote.

15. Anthony was very friendly with the staff - he chatted us up like he was a part of the office. He brought us lunch almost every time he visited the office. He once brought Dr. Harper an Edible Arrangement around Christmastime.


16. Anthony visited Dr. Harper during regular office hours and would have witnessed the waiting room packed with individuals who appeared to be drug addicts. He would have seen some patients who appeared to be high or who were sleeping. In addition, Anthony came to the office on the day of Tequilla Berry's altercation with a patient in the summer of 2011. Many police officers had responded to the scene and were in the parking lot and inside the office when Anthony arrived. I saw Anthony discussing the incident with another staff member.

17. Anthony continued to visit Dr. Harper during the entire time that I worked for Dr.

Harper. I do not recall any period where Anthony did not regularly visit the office.

18. In late December 2011, I had surgery and missed some work. I received a note from Dr. Harper in early January 2012, instructing me not to come back to work. I did not work for Dr. Harper after that.

I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed in Columbus, Ohio on Feb 7, 2019.



Ramona Harrison